

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X

Actava TV, Inc., Master Call Communications, Inc.,
Master Call Corporation, and Rouslan Tsoutiev,

18-CV-06626 (ALC)

Plaintiffs,

-against-

Joint Stock Company "Channel One Russia Worldwide,"
Closed Joint Stock Company "CTC Network," Closed
Joint Stock Company "New Channel", Limited Liability
Company "Rain TV-Channel," Closed Joint Stock
Company "TV DARIAL," Limited Liability
Company "Comedy TV," and Kartina Digital GmbH

NOTICE OF MOTION

Defendants.

-----X

PLEASE TAKE NOTICE that upon the annexed Declaration of Raymond J. Dowd, Declaration of Alexander Shprekher, Declaration of Natalya Sindееva, Declaration of Olga Panfilova, the Memorandum of Law in Support and all the prior proceedings in this matter, all Defendants move to dismiss Plaintiffs' Amended Complaint (ECF 40) pursuant to Rule 12(b)(1), 12(b)(2), 12(b)(5), 12(b)(6) and 12(c) of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that opposition papers must be served in accordance with Local Rule 6.1 or as otherwise directed by the Court.

Dated: New York, New York
January 29, 2019

Respectfully submitted,

DUNNINGTON BARTHOLOW & MILLER LLP
Attorneys for Defendants

By: /s/ Raymond J. Dowd
Raymond J. Dowd
Samuel A. Blaustein
Hardin P. Rowley
Kamanta C. Kettle
250 Park Avenue
New York, NY 10177
Tel: (212) 682-8811
rdowd@dunnington.com
sblaustein@dunnington.com
hrowley@dunnington.com
kkettle@dunnington.com